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HOUSER BROS. CO. dba RANCHO DEL
9 REY MOBILE HOME ESTATES

10 UNITED STATES BANKRUPTCY COURT

11 CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

12 In re

13 JAMIE LYNN GALLIAN,
14 Debtor.

Case No. 8:21-bk-11710-SC

Chapter 7

STIPULATION TO CONTINUE HEARING ON
MOTION FOR RELIEF FROM THE
AUTOMATIC STAY (DK. NO. 278), FROM
JANUARY 18, 2023, TO FEBRUARY 1, 2023

17 CURRENT HEARING DATE:

18 Date: January 18, 2023

19 Time: 10:00 a.m.

20 Ctrm: 5C¹

21 Location: 411 W. Fourth Street, Santa Ana, CA
92701

22 CONTINUED HEARING DATE:

23 Date: February 1, 2023

24 Time: 9:30 a.m.

25 Ctrm: 5C

26 Location: 411 W. Fourth Street, Santa Ana, CA
92701

27 TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY JUDGE,
28 AND ALL INTERESTED PARTIES:

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Notwithstanding the opening of the Courthouse to in-person proceedings, in light of the overwhelming support by the Bar for continued virtual appearances, Judge Clarkson will continue utilizing ZoomGov in a hybrid format, holding the majority of hearings by video, with an option for in-person hearings. Please see the calendaring instructions which may be located in the Self-Calendaring section of Judge Clarkson's webpage for more details and effective dates..

1 HOUSER BROS. CO., a California limited partnership dba RANCHO DEL REY MOBILE
2 HOME ESTATES ("Houser Bros."), together with Debtor, Jamie Lynn Gallian ("Ms. Gallian," and
3 together with Houser Bros., the "Parties") submit the following stipulation:

4 **RECITALS**

5 A. On July 9, 2021, Ms. Gallian filed a voluntary petition under Chapter 7 of Title 11 of
6 the United States Code. The filing of the petition commenced this bankruptcy case.

7 B. On December 28, 2022, as Dk. No. 278, Houser Bros. filed a Motion for Relief from
8 the Automatic Stay or For Order Confirming that the Automatic Stay Does Not Apply Under 11
9 U.S.C. § 362(l) (Unlawful Detainer) ("Motion") with a hearing date of January 18, 2023, at 10:00
10 a.m.

11 C. Debtor contends that service was defective and she requested additional time to
12 respond. Houser Bros. disagrees that service was improper but does not object to providing Debtor
13 additional time to respond by way of a continued hearing.

14 WHEREFORE, to resolve the issue, the Parties agree as follows:

15 **Stipulation**

16 1. The hearing on the Motion shall be continued from January 18, 2023, at 10:00 a.m.,
17 to **February 1, 2023, at 9:30 a.m.**

18 2. The deadline for Ms. Gallian to file and serve a response to the Motion is extended
19 from January 4, 2023, to and including January 18, 2023;

20 3. The deadline for any party to file and serve a reply in support of the Motion is will be
21 January 25, 2023; and

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1 4. This Stipulation may be executed in one or more counterparts, and facsimile or
2 electronic signatures may be used in filing this document with the Court.

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4 DATED: January 10, 2023

MARSHACK HAYS LLP

5 By: /s/ D. Edward Hays

6 D. EDWARD HAYS
7 LAILA MASUD
8 BRADFORD N. BARNHARDT
9 Attorneys for Plaintiff,
HOUSER BROS. CO. dba RANCHO DEL
REY MOBILE HOME ESTATES

10
11 DATED: January 10, 2023

12 By:  1/10/23
13 JAMIE LYNN GALLIAN

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
870 Roosevelt, Irvine, CA 92620.

A true and correct copy of the foregoing document entitled: **STIPULATION TO CONTINUE HEARING ON MOTION FOR RELIEF FROM THE AUTOMATIC STAY (DK. NO. 278), FROM JANUARY 18, 2023 TO FEBRUARY 1, 2023** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **January 10, 2023**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**: On **January 10, 2023**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

DEBTOR

JAMIE LYNN GALLIAN
16222 MONTEREY LN UNIT 376
HUNTINGTON BEACH, CA 92649

☐ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL**: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **January 10, 2023**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

VIA PERSONAL DELIVERY:

PRESIDING JUDGE'S COPY

HONORABLE SCOTT C. CLARKSON
UNITED STATES BANKRUPTCY COURT, CENTRAL DISTRICT OF CALIFORNIA
RONALD REAGAN FEDERAL BUILDING AND COURTHOUSE
411 WEST FOURTH STREET, SUITE 5130 / COURTROOM 5C
SANTA ANA, CA 92701-4593

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

January 10, 2023
Date

Layla Buchanan
Printed Name

/s/ Layla Buchanan
Signature

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** CONTINUED:

- **ATTORNEY FOR CREDITOR AND PLAINTIFF HOUSER BROS. CO.:** Bradford Barnhardt
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- **ATTORNEY FOR TRUSTEE JEFFREY I GOLDEN (TR):** Aaron E DE Leest adeleest@DanningGill.com,
danninggill@gmail.com; adeleest@ecf.inforuptcy.com
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- **ATTORNEY FOR DEFENDANT RANDALL L NICKEL:** Mark A Mellor mail@mellorlawfirm.com,
mellormr79158@notify.bestcase.com
- **INTERESTED PARTY COURTESY NEF:** Valerie Smith claims@recoverycorp.com
- **U.S. TRUSTEE:** United States Trustee (SA) ustpreion16.sa.ecf@usdoj.gov

4879-0465-9015, v. 1